

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

PAMELA G. CAPPETTA

Plaintiff,

v.

GC SERVICES, LP

Defendant.

Civil Action
No. 3:08cv288

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF HER MOTION FOR
ENLARGEMENT OF TIME TO SUBMIT DR. KARAM'S DECLARATION**

COMES NOW the Plaintiff, and as for her Memorandum in Support of her Motion for Enlargement of Time to Submit Dr. Karam's declaration regarding Plaintiff's medical records, she states as follows:

Pursuant to and since the entry of this Court's order regarding same, Plaintiff's counsel has diligently sought to coordinate the submission of the declaration of Dr. Martha Karam. However, Dr. Karam was out of town through Thursday, March 5th and is today reviewing the proposed language of her declaration. It is expected that her declaration will be signed and sent to Plaintiff's counsel in the very near future. Accordingly, Plaintiff moves for an extension of time for the submission of Dr. Karam's declaration, such that it will be filed on or before March 16, 2009.

Respectfully submitted,
PAMELA G. CAPPETTA,

/s/

Matthew J. Erausquin, VSB#65434
Leonard A. Bennett, VSB#37523
Counsel for the Plaintiff

CONSUMER LITIGATION ASSOCIATES, P.C.
3615-H Chain Bridge Road
Fairfax, VA 22030
Tel: 703-273-7770
Fax: 888-892-3512
matt@clalegal.com

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of March, 2009 I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification to the following:

Rebecca H. Royals
Butler Williams & Skilling P.C.
100 Shockoe Slip, 4th Floor
Richmond, VA 23219
royals@butlerwilliams.com

James Curie Skilling
Butler Williams & Skilling P.C.
100 Shockoe Slip, 4th Floor
Richmond, VA 23219
jskilling@butlerwilliams.com

David Matthew Schultz
Hinshaw & Culbertson LLP
222 N LaSalle St., Suite 300
Chicago, IL 60601
dschultz@hinshawlaw.com

Zev Hillel Antell
Butler Williams & Skilling P.C.
100 Shockoe Slip, 4th Floor
Richmond, VA 23219
zantell@butlerwilliams.com

/s/

Matthew J. Erasquin, VSB#65434
Leonard A. Bennett, VSB#37523
Counsel for the Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
3615-H Chain Bridge Road
Fairfax, VA 22030
Tel: 703-273-7770
Fax: 888-892-3512
matt@clalegal.com